

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
(at Boston)

---

IN RE: NEW ENGLAND ) Master File No. 1:13-MD-2419-RWZ  
COMPOUNDING PHARMACY, ) MDL Docket No. 2419  
INC. PRODUCTS LIABILITY ) This Document Relates To:  
LITIGATION ) *ALL CASES*  
)  
)

---

**GDC PROPERTY MANAGEMENT, LLC'S NOTICE OF SERVICE DISCOVERY  
OBJECTIONS AND RESPONSES**

Defendant GDC Property Management, LLC ("GDC") gives notice to the Court and to all parties that on April 8, 2015, GDC has served written objections, responses, and answers to the discovery requests propounded to it by Saint Thomas Entities.

Respectfully submitted,

/s/ Joshua A. Klarfeld  
Joseph P. Thomas (OH #0040379)  
Ulmer & Berne LLP  
600 Vine Street, Suite 2800  
Cincinnati, OH 45202  
Tel: (513) 698-5000  
Fax: (513) 698-5001  
E-mail: [jthomas@ulmer.com](mailto:jthomas@ulmer.com)

Joshua A. Klarfeld (OH #0079833)  
Ulmer & Berne LLP  
1660 W. 2nd Street, Suite 1100  
Cleveland, OH 44113  
Tel: (216) 583-7000  
Fax: (216) 583-7001  
E-mail: [jklarfeld@ulmer.com](mailto:jklarfeld@ulmer.com)

Attorneys for Defendant  
GDC Properties, LLC

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing has been filed with the Clerk of the Court on April 8, 2015, using the CM/ECF system which sent notification of this filing to all ECF registered counsel of record via e-mail generated by the Court's ECF system.

*/s/ Joshua A. Klarfeld*  
Joshua A. Klarfeld (OH #0079833)